

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JOHN FULTON,	)	
	)	
Plaintiff,	)	20-cv-3118
	)	
v.	)	Judge Lefkow
	)	
ROBERT BARTIK, et al.,	)	Jury Trial Demanded
	)	
Defendants.	)	
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ANTHONY MITCHELL,	)	
	)	
Plaintiff,	)	20-cv-3119
	)	
v.	)	Judge Lefkow
	)	
ROBERT BARTIK, et al.,	)	Jury Trial Demanded
	)	
Defendants.	)	

**DEFENDANTS' MOTION FOR LEAVE TO FILE SUPPLEMENTAL AUTHORITY  
IN SUPPORT OF THEIR MOTION TO AMEND THE JUDGMENT**

Defendants, by and through their undersigned counsel, respectfully move this Court for leave to file supplemental authority in support of Defendants' Motion to Amend the Judgment (Dkt. No. 511). In support thereof, Defendants state as follows:

1. After a three-week jury trial, Plaintiffs John Fulton and Anthony Mitchell were each awarded \$60 million in compensatory damages for their 16 years in custody stemming from their prosecution and conviction for the 2003 murder of Christopher Collazo.

2. On April 8, 2025, Defendants filed a motion to amend the judgment. (Dkt. No. 511). On May 27, 2025, Plaintiffs filed their response in opposition to Defendants' motion to amend the

judgment. (Dkt. No. 519). On June 24, 2025, Defendants filed their reply in support of their motion to amend the judgment. (Dkt. No. 527). Briefing is now closed.

3. On August 28, 2025, a federal jury in Philadelphia awarded plaintiff Tremaine Hicks \$3 million based on his claim that he was wrongfully convicted for 19 years connected to a rape he said he did not commit. *See Hicks v. City of Philadelphia, et al.*, Civil No. 2:22-cv-00977 (Dkt. No. 413). This reversed conviction case is relevant to Defendants' motion to amend the judgment.

4. Thus, Defendants respectfully submit the attached Final Judgment Order by United States District Judge John F. Murphy of the United States District Court for the Eastern District of Pennsylvania in the *Hicks v. City of Philadelphia, et al.*, Civil No. 2:22-cv-00977, detailing Hick's damages award in the amount of \$3 million dollars, attached hereto as Ex. 1.<sup>1</sup>

WHEREFORE, Defendants respectfully request that this Court grant their motion for leave to file supplemental authority in support of Defendants' Motion to Amend the Judgment. (Dkt. No. 511).

Dated: September 2, 2025

Respectfully submitted,

/s/ Natalie Y. Adeeyo  
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Natalie Adeeyo, Breana Brill,  
& John Cerney  
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<sup>1</sup> For a summation of the relevant background facts, see *Hicks v. City of Philadelphia, et al.*, Civil No. 2:22-cv-00977 (Dkt. No. 1), attached hereto as Ex. 2, and *Hicks v. City of Philadelphia, et al.*, Civil No. 22-977, 2025 WL 1448205, at \*1-5 (E.D. Pa. May 20, 2025), attached hereto as Ex. 3.

**CERTIFICATE OF SERVICE**

I, Natalie Adeeyo, hereby certify that I have caused true and correct copies of the above and foregoing motion to be served on all counsel of record via electronic mail, on September 2, 2025.

/s/ Natalie Y. Adeeyo